

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION**

A+ SAFER, LLC; and LOWELL CRAWFORD,

Plaintiffs,

v.

CASE NO.: 9:24-cv-80255-RLR

GENO ROEFARO; APPDEVELOP.COM,
LLC; WEBDEVELOP.COM, LLC; and
SAFERWATCH, LLC,

Defendants.

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GENO ROEFARO,

Counter-Plaintiff,

v.

LOWELL CRAWFORD,

Counter-Defendant.

_____ /

EXHIBIT LIST

| Presiding Judge: Rosenberg | | | Plaintiff's Attorney: None | | Defendants' Attorney: Christopher S. Prater and Michael A. Boehringer | |
|--|---------|--------------|----------------------------|----------|---|--------------------------------|
| Trial Dates: 4-week period beginning 3/10/25 | | | Court Reporter: | | Courtroom Deputy: | |
| PLF No. | DEF No. | Date Offered | Marked | Admitted | Description | Objections |
| 1. | | | | | Crawford001 to Crawford003 | R, H, A |
| 2. | | | | | Crawford004 to Crawford018 | R, UP, H, A |
| 3. | | | | | Crawford019 to Crawford041 | R, UP, H, A |
| 4. | | | | | Crawford042 to Crawford043 | |
| 5. | | | | | Crawford044 | R, incomplete |
| 6. | | | | | Crawford045 to Crawford046 | Incomplete (illegible) for 046 |
| 7. | | | | | Crawford047 to Crawford061 | R, UP, H, A |
| 8. | | | | | Crawford062 to Crawford063 | |
| 9. | | | | | Crawford064 | R, H |

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| 10. | | | | | Crawford065 to Crawford079 | Duplicative of Ex. 4 |
| 11. | | | | | Crawford080 to Crawford098 | R, UP, H, A |
| 12. | | | | | Crawford099 to Crawford122 | R, incomplete |
| 13. | | | | | Crawford123 to Crawford141 | Incomplete (ex. 14 is rest) |
| 14. | | | | | Crawford137 to Crawford141 | Incomplete |
| 15. | | | | | Crawford142 to Crawford143 | |
| 16. | | | | | Crawford144 | |
| 17. | | | | | Crawford145 | R, H, A, UP, incomplete |
| 18. | | | | | Crawford146 to Crawford148 | R, A, H |
| 19. | | | | | Crawford149 to Crawford150 | R, A, H |
| 20. | | | | | Crawford151 | |
| 21. | | | | | Crawford152 | R |
| 22. | | | | | Crawford153 | R |
| 23. | | | | | Crawford154 | R, incomplete |
| 24. | | | | | Crawford155 | |
| 25. | | | | | Crawford156 | R |
| 26. | | | | | Crawford157 | |
| 27. | | | | | Crawford158 | |
| 28. | | | | | Crawford159 | R, incomplete |
| 29. | | | | | Crawford160 | R, incomplete |
| 30. | | | | | Crawford161 | R, A, incomplete |
| 31. | | | | | Crawford162 | R, A, incomplete |
| 32. | | | | | Crawford163 to Crawford169 | R, A, incomplete |
| 33. | | | | | Crawford170 | R |
| 34. | | | | | Crawford171 | |
| 35. | | | | | Crawford172 | |
| 36. | | | | | Crawford173 | |
| 37. | | | | | Crawford174 | I, R, H, UP, incomplete |
| 38. | | | | | Crawford175 | I, R, H, UP, incomplete |
| 39. | | | | | Crawford176 | R, H |
| 40. | | | | | Crawford177 | |
| 41. | | | | | Crawford178 | |
| 42. | | | | | Crawford179 | R, H, A, incomplete |
| 43. | | | | | Crawford180 | |
| 44. | | | | | Crawford181 | R, incomplete |
| 45. | | | | | Crawford182 to Crawford184 | R, A, incomplete |
| 46. | | | | | Crawford185 | I, R, H, UP, incomplete |
| 47. | | | | | Crawford186 | |

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| 48. | | | | | Crawford187 | Duplicative of Ex. 17, R, H, A, UP, incomplete |
| 49. | | | | | Crawford188 to Crawford190 | R, A, incomplete |
| 50. | | | | | Crawford191 | R |
| 51. | | | | | Crawford192 | R |
| 52. | | | | | Crawford193 | Duplicative of Ex. 44, R, incomplete |
| 53. | | | | | Crawford194 | |
| 54. | | | | | Crawford195 | |
| 55. | | | | | Crawford196 to Crawford200 | R, A, H, incomplete |
| 56. | | | | | Crawford201 to Crawford203 | Duplicative of Exs. 18, 94, R, A, H |
| 57. | | | | | Crawford204 | Incomplete |
| 58. | | | | | Crawford205 to Crawford223 | Duplicative of Ex. 11, R, UP, H, A |
| 59. | | | | | Crawford224 | |
| 60. | | | | | Crawford225 to Crawford226 | |
| 61. | | | | | Crawford227 | |
| 62. | | | | | Crawford228 | |
| 63. | | | | | Crawford229 | |
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| 73. | | | | | Crawford239 | |
| 74. | | | | | Crawford240 | |
| 75. | | | | | Crawford241 | Duplicative, R |
| 76. | | | | | Crawford242 | |
| 77. | | | | | Crawford243 | |
| 78. | | | | | Crawford244 | |
| 79. | | | | | Crawford245 | |
| 80. | | | | | Crawford246 | |
| 81. | | | | | Crawford247 | |

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| 82. | | | | | Crawford248 to Crawford252 | Duplicative of Ex. 55, R, A, H, incomplete |
| 83. | | | | | Crawford253 | Duplicative of Ex. 20 |
| 84. | | | | | Crawford254 | |
| 85. | | | | | Crawford255 | |
| 86. | | | | | Crawford256 | |
| 87. | | | | | Crawford257 | |
| 88. | | | | | Crawford258 | R, incomplete |
| 89. | | | | | Crawford259 | Duplicative of Ex. 44, R, incomplete |
| 90. | | | | | Crawford260 | |
| 91. | | | | | Crawford261 | |
| 92. | | | | | Crawford262 | |
| 93. | | | | | Crawford263 | |
| 94. | | | | | Crawford264 to Crawford266 | Duplicative of Exs. 18, 56, R, A, H |
| 95. | | | | | Crawford267 to Crawford268 | Duplicative of Ex. 15, 96 |
| 96. | | | | | Crawford269 to Crawford270 | Duplicative of Ex. 15, 95 |
| 97. | | | | | Crawford271 to Crawford272 | I, R, H, A, UP, incomplete, speculation |
| | 1. | | | | Confidential Transfer & Release Agreement – <i>Defendants001 - 007</i> | |
| | 2. | | | | Membership Interest Purchase Agreement - <i>Defendants008 - 026</i> | |
| | 3. | | | | Custom Mobile Application Proposal <i>Defendants027 - 044</i> | R |
| | 4. | | | | Roefaro Resignation Letter <i>Defendants045</i> | |
| | 5. | | | | Email chain Re: Resignation of Geno Roefaro for A+ SAFER <i>Defendants046 – 048</i> | |
| | 6. | | | | Email re: Breakdown of Contributions Towards The Technology Development <i>Defendants049</i> | |

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| | 7. | | | | Text Message Chain <i>Defendants 050 - 058</i> | |
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Dated: February 24, 2025

Respectfully submitted,

By: /s/ Michael A. Boehringer

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*Counsel for Defendants and
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CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2025, the foregoing document was electronically filed via CM/ECF as well as emailed to Mr. Crawford at: lccrawford07@gmail.com, and mailed to him at 3320 Birch Terrace, Davie, Florida 33330.

By: /s/ Michael A. Boehringer

Michael A. Boehringer